



LONG ISLAND LIGHTING COMPANY

EXECUTIVE OFFICES: 175 EAST OLD COUNTRY ROAD • HICKSVILLE, NEW YORK 11801

July 31, 1989

Mr. Vincent Frisina, P.E.
Suffolk County Department
of Health Service
15 Horseblock Place
Farmingville, New York 11738

Northport Power Station -
Truck Unloading Upgrade

Dear Mr. Frisina:

As you may be aware, the Long Island Lighting Company (LILCO) has been working towards making specific improvements at a number of LILCO truck unloading facilities. These improvements include the installation of spill containment areas and other spill control devices around No. 2 oil truck delivery stations. In Suffolk County we have upgraded these facilities at the West Babylon and East Hampton Internal Combustion Sites and at the Port Jefferson Power Station.

However, recent changes to Suffolk County's Article 12 code have complicated our design work. The Article 12 code now requires that double wall piping or single wall piping in an impervious trench be installed if any modifications are performed on the existing No. 2 fuel oil delivery piping. This requirement could have a major impact at our Northport Power Station.

The Northport Power Station presently has 5 separate No. 2 oil delivery points (one for each of the four main steam units and one for a tank associated with an emergency gas turbine on the site). It is our intention to replace these five separate stations with one fully upgraded truck unloading station that will be connected to the five tanks via an arrangement of various pipes and valves as shown on the attached plans. Due to the long length of piping required as well as the constraints imposed by the site layout and adjacent roadway, the requirement to install double-walled piping or single-walled piping in a trench will result in a considerable expense for this project. The attached drawings depict the way the facility would look if we were held to strict conformance with the new code. We estimate that the

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cost of strict compliance (including the double walled piping, installation of trenches, leak detection, sectionalization of the piping run, etc.) will be over \$600,000 more than the cost associated with a single wall piping installation.

We believe this cost is excessive and respectfully request that you review these plans and inform us if it is absolutely necessary to go to this level of protection for this type of installation. This is especially true in light of the fact that this site is fully manned 24 hours per day and it should also be recognized that there are no drinking water wells anywhere near this facility. If a formal waiver from the Article 12 code is required, we will prepare the necessary application form.

Other design packages for the Shoreham Nuclear Internal Combustion Site and the Southampton and Southold I.C. units will also be submitted for your approval shortly. However, we expect those facilities to meet the new code requirements since they do not have as complicated a design situation as Northport.

Please advise me if you have any questions. I can be reached at 420-6132.

Very truly yours,

ORIGINAL SIGNED BY

Steven V. Dalton, Manager
Environmental Sciences Division

SVD/cam

Enclosure

cc: Messrs. George J. Maytrott (NYSDEC)
James Pim (SCDHS)

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Environ Engr. File 23500E01